

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**In re:** :  
: **Case No.: 20-12719**  
**Debra Davie** : **Chapter 13**  
: **Judge Ashely M. Chan**  
**Debtor(s)** : **\*\*\*\*\***

**OBJECTION OF PNC BANK, N.A. TO CONFIRMATION OF THE PLAN**  
**(DOCKET NUMBER 2)**

PNC Bank, N.A. ("Creditor") by and through its undersigned counsel, objects to the confirmation of the currently proposed Chapter 13 Plan ("Plan") filed by Debra Davie ("Debtor") as follows:

1. Creditor holds a security interest secured by a mortgage lien on Debtor's property commonly known as 220 Willow Rd., Wallingford, PA 19086-6951 ("Property").
2. Creditor intends to file a Proof of Claim including a pre-petition arrearage in the approximate amount of \$6,200.00.
3. Debtor's Plan does not provide for the arrearage due on Creditor's claim, and therefore represents an impermissible modification of Creditor's claim and a violation of 11 U.S.C. §§1322 and 1325.

WHEREFORE, Creditor respectfully requests that the Court deny the confirmation of the Debtor's currently proposed Plan.

Respectfully submitted,

/s/ Karina Velter

Karina Velter, Esquire (94781)  
Adam B. Hall (323867)  
Sarah E. Barngrover (323972)  
Manley Deas Kochalski LLC  
P.O. Box 165028  
Columbus, OH 43216-5028

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Attorneys for Creditor

The case attorney for this file is Karina  
Velter.

Contact email is [kvelter@manleydeas.com](mailto:kvelter@manleydeas.com)

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing Objection of PNC Bank, N.A. to the Confirmation of the Original Plan was served on the parties listed below via e-mail notification:

Office of U.S. Trustee, Party of Interest, (Registered address)@usdoj.gov

Scott F. Waterman, Chapter 13 Trustee, Chapter 13 Trustee, 2901 St. Lawrence Ave.,  
Reading, PA 19606, ECFMail@ReadingCh13.com

John L. McClain, Attorney for Debra Davie, John L. McClain and Associates, P.O. Box 123,  
Narberth, PA 19072-0123, aaamcclain@aol.com

The below listed parties were served via regular U.S. Mail, postage prepaid, on August 4,  
2020:

Debra Davie and Joseph Davie, 220 Willow Rd, Wallingford, PA 19086

Debra Davie and Joseph Davie, 220 Willow Rd, Wallingford, PA 19086-6951

Delaware County Tax Claim Bureau, Gov't Ctr Bldg, 201 W. Front Street, Media, PA 19063

Pnc Bank, 2730 Liberty Ave, Pittsburgh, PA 15222

Township of Nether Providence, 214 Sykes Lane, Wallingford, PA 19086

Township of Nether Providence, 214 Sykes Lane, Wallingford, PA 19086

Worlds Foremost Bank, 4800 Nw 1st Street, Lincoln, NE 68521

PNC Bank, 2730 Liberty Ave, Pittsburgh, PA 15222

DATE: August 4, 2020

/s/ Karina Velter

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